



Air Quality Permitting

Technical Analysis

February 7, 2003

Tier II Operating Permit No. T1-030102

flexcel, Post Falls

AIRs Facility No. 055-00038

Prepared by:

*Carole Zundel, Permit Writer
Program Office*

AMENDED FINAL PERMIT

TABLE OF CONTENTS

SUMMARY.....	3
1. PURPOSE	4
2. SUMMARY OF EVENTS.....	4
3. BASIS OF THE ANALYSIS	4
4. FACILITY DESCRIPTION	4
5. REGULATORY ANALYSIS	5
6. REGULATORY ANALYSIS – EMISSIONS UNITS	5
7. REGISTRATION FEES	6
8. RECOMMENDATION.....	6

SUMMARY

No notice to the public or to affected states are required per IDAPA 58.01.01.381.02(c), *Rules for the Control of Air Pollution in Idaho*, for this administrative amendment.

1. PURPOSE

The purpose of this memorandum is to explain the legal and factual basis for this administrative amendment to the Tier I operating permit in accordance with IDAPA 58.01.01.381.

flexcel requested that the PTC and Tier I operating permit be amended to incorporate the following changes:

- Change the facility name from Harpers to flexcel.
- Change the contact person name and phone number.
- Clarify the definition of the waste component in the equation used to calculate particulate matter emissions from spray painting in the paint booth (Permit Condition 5.10).
- Delete the parenthetical examples of components of the waste stream in Permit Condition 5.12.

Additionally, DEQ input the permit issue date (in place of the general wording "issue date") into General Provision 24 regarding semiannual monitoring reports. The provision required that the first semiannual monitoring report be submitted to DEQ six months after the permit was issued. The original issue date was specifically input into the provision to eliminate confusion as to when the first report, and subsequent reports, are due.

2. SUMMARY OF EVENTS

On September 19, 2002, DEQ received a permit amendment request, and on November 25, 2002, DEQ received a name change and contact person change notification from flexcel for their flexcel, Post Falls facility. On January 27, 2003, DEQ issued a revised PTC. On February 6, 2003, DEQ sent a letter to the facility stating that an amended Tier I operating permit was being prepared in accordance with IDAPA 58.01.01.381.

3. BASIS OF THE ANALYSIS

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- Amended Permit to Construct (PTC) issued to flexcel on January 27, 2003
- PTC and Tier I operating permit amendment request received on September 19, 2002
- Name change and facility contact notification received on November 25, 2002.

4. FACILITY DESCRIPTION

General Process Description

The portions of the facility for this modification are the spray paint operation and the waste stream components. Paint is transported to the paint gun through a supply hose. When the painting operation is finished, the residual paint in the line is removed from the line and has not been sprayed through the spray gun. This residual paint in the line is W_j in the equation that calculates particulate matter emissions in Permit Condition 5.10.

The waste stream consists of materials from many sources and is not limited to the examples that were originally given in the previous PTC.

Permitting History

January 11, 1993	The original PTC was issued.
June 23, 1994	A modified PTC was issued.
October 2, 1995	A modified PTC was issued.
March 18, 1996	A modified PTC was issued.
March 30, 1998	A modified PTC was issued.
June 11, 1999	A modified PTC was issued.
August 18, 1999	An modified PTC was issued, replacing the March 30, 1998 PTC.
September 3, 2002	A final Tier I operating permit was issued.
March 15, 2002	A modified PTC was issued.

Emissions Description

The emissions have not changed from the previous permit.

5. REGULATORY ANALYSIS

6. REGULATORY ANALYSIS – EMISSIONS UNITS

FACILITY-WIDE PAINT, SOLVENT, ADHESIVE, AND OTHER CHEMICAL USE

6.1 Emissions Unit Description

This modification refers to the spray paint operation and the waste stream components. The description is as described in the "General Process Description" section of this tech memo.

6.2 Permit Requirement – Calculation of PM₁₀ Emissions, Permit Condition 5.10

This requirement states the equation to be used to calculate PM₁₀ emissions from spray painting.

6.3 Compliance Demonstration

Compliance is demonstrated by using the equation when to calculate PM₁₀ emissions from the spray painting operation.

6.4 Permit Requirement – Monthly Testing of Waste Stream, Permit Condition 5.12

The modification removed the examples of waste stream components.

6.5 Compliance Demonstration

Compliance demonstration is the same as in the original permit except that the waste stream components are not limited to the three examples given in the original permit.

7. REGISTRATION FEES

This facility is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees in accordance with IDAPA 58.01.01.387 apply.

8. RECOMMENDATION

Based on the Tier I application and review of state rules and federal regulation, staff recommends that DEQ issue amended final Tier I operating Permit No. 055-00038 to flexcel for their Post Falls metal office furniture manufacturing facility

CZ/sd

Permit No. T1-030102

G:\Air Quality\Stationary Source\SS Ltd\T1\Harpers\flexcel amend T1 Tech Memo.doc